

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

MARK CHAPMAN HARRIS, Pro Se

And on behalf of others similarly situated

Plaintiffs,

vs.

LEE MOAK, and the Airline Pilots Association

2:12-cv- 261

Statement of Claims

This claim is brought under Denial of Fair Representation, Breach of Fiduciary Duty, and Invasion of Privacy. The Plaintiff is a dues paying member of the Airline Pilots Association (ALPA). This union both local and national has failed in its fiduciary duty to represent the Plaintiff, subjected him to gross violations of his privacy, and pressured him to remain silent. Based on past reports, this union has refused in the past to assist other pilots in addressing the criminal conduct of FAA doctors Michael Berry and Warren Silberman.

Events

1. The Plaintiff has submitted a companion complaint providing details of events.
2. Throughout this process, the Plaintiff has sought assistance from his union in correcting records and wrongdoing by participants of a FAA substance abuse program created by that union which is riddled with corruption.
3. These requests have been made to union attorney Terry Saturday, HIMS sponsor Brad Secker, the ALPA Aeromedical division, and ALPA HIMS Chairman Chris Stoerbeck.
4. No assistance whatsoever has been provided, and in fact the Plaintiff has been repeatedly pressured to remain silent, not ask questions, and to quietly let his rights be violated and career ruined by unethical doctors in a program created by ALPA.
5. The Plaintiff's private and confidential records have been disseminated without releases by a union official in the program.
6. A union official engaged in gross invasion of the Plaintiff's privacy.
7. Medical tests were performed on the Plaintiff ordered by a contractor retained by that individual without releases. The Plaintiff was pressured to sign releases after the fact.

RELIEF REQUESTED

60. The Plaintiff seeks a court appointed attorney.
61. The Plaintiff seeks legal fees be paid by the Defendants.

62. The Plaintiff seeks injunctive relief for invasions of privacy by ALPA.
63. The Plaintiff seeks a refund of union dues paid since 2001.

DEMAND FOR JURY TRIAL

64. Plaintiffs hereby request trial by jury on all issues so triable.
65. Respectfully submitted this 31 day of Oct, 2012.

11-2-2012

(Date)

Mark Han

(Signature of Plaintiff)

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Terri B. Pilgrim
notary public
www. exp: 10-1-2014

